Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of:		
	)	
Transition of the Nation's	)	GN Docket No. 12-353
Communications Infrastructure to	)	
High-speed Next Generation	)	
Networks	)	
	)	

Comments of
CALinnovates, Alphabird, Appallicious, At The Pool, Avetta, iSideWith, Lex Machina, MySocialCloud & Silicon Valley Italian Executive Council

I. Introduction and Summary

Consumers are driving the market that is revolutionizing communications and creating demand for more data than ever before. By 2016, there will be 8 connected devices per American, up from 4.4 per American in 2011, making the transition to larger and stronger networks a necessity. This is why we express our support for the AT&T Internet Protocol ("IP") Transition Petition currently pending at the Federal Communications Commission ("FCC"). The Petition asks the FCC to work with the private sector to begin geographically limited beta tests to examine the complex issues associated with the transition away from existing TDM-based networks to IP-based networks.

The acceptance of this petition would be a logical next step in accelerating the evolution of technology.

We understand that the future of our industry depends on fast and robust networks accessible to as many Americans as possible. These new IP-based networks will drive increased connectivity and innovation, while fostering immense capital investment.

II. Expanding IP networks leads to improved consumer access to community benefits and new technologies.

A recent announcement in California demonstrates why the IP Transition should take place. Governor Jerry Brown and the University of California Regents announced last week that the state's schools will begin developing curriculum to offer online courses. These courses, however, will only be accessible to those with high-speed IP-based broadband networks.

IP-enabled networks are capable of offering a greater variety of advanced IP-based services at speeds and data-delivery rates many times faster than those delivered on old TDM-based networks. Bringing these IP-based networks and services to the door of each business and home will improve and expand consumer access to the latest networks and technologies, but can only be realized when we transition away from antiquated TDM-based telephone networks and migrate to the networks of the future that take advantage of 21st century IP-based technologies.

III. Private and public sector must work together to modernize the nation's communications regulations to meet consumers' needs, assure consumer protection, and reflect the modern marketplace.

Investing in stronger and faster IP networks will unlock a world of opportunity for everyone from a local rural farmer connecting to the global market, to a student who relies on online platforms for learning, to a homebound patient with medical conditions seeking a second opinion from a specialized physician outside of their community.

To bring these advanced services quickly to consumers, the transition to IP networks should occur in a collaborative environment where private industry and the public sector work together toward mutually-beneficial solutions. For example, current regulations mandate continued investment in 20th century networks that consumers are abandoning and that fail to offer the high-speed video, Internet and applications of the future.

Regulations from the 1930s, when the communications market was a regulated utility focused on voice-centric telephony, still linger. These regulations are not only outdated, but they also create uneven regulatory burdens among existing competitive service providers. Today's communications ecosystem no longer provides voice service solely through traditional telephone companies, but instead offers advanced communications services to consumers via wireless carriers, cable companies, and traditional telephone companies. Yet telephone companies are the only entities that remain saddled with outdated regulations that require them to maintain antiquated – and expensive – voice-based networks while concurrently building out state-of-the-art IP networks and infrastructure that everyone wants and needs. These outdated regulatory requirements imposed on only some communications providers hamper investment in advanced IP-enabled broadband networks and continue to delay the IP Transition that our nation needs to remain globally competitive.

Given the complexity of the IP Transition, the FCC should ensure that it address this much-needed transition wisely. Currently, the FCC has before it numerous pending proceedings that impact these issues; however, examining these critical issues in separate proceedings concurrently can result in massive inefficiencies, thus slowing transition to IP-enabled networks and services and delaying the advanced IP services consumers need now.

Examining the IP transition in the manner described in the Petition allows for a public process with input from all stakeholders involved. The geographically limited beta tests proposed in the Petition provide the FCC with the best and most efficient opportunity to comprehensively examine and address the complex regulatory and technical issues related to the expansion and transition to all IP-enabled networks and services.

It is time to invest in the future of our nation's technology and communications networks and infrastructure, and it is critical that government work with industry to ensure a fast – and smooth – transition. Collaboration will also ensure that nobody is left without a reliable, affordable connection and that the many transition issues are addressed comprehensively at one time.

IV. **The Petition should be granted**

To be extremely clear, this is not about fighting regulation, nor is it about deregulation. This is about updating a regulatory environment for the IP age that promotes access, protects consumers and enhances our economy. As such, we, the undersigned, write in support of AT&T's IP Transition Petition and urge the FCC to begin the nation-wide beta tests as proposed.

Sincerely,

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